

DEPARTMENT OF THE ARMY
UNITED STATES ARMY LEGAL SERVICES AGENCY
9275 GUNSTON ROAD
FORT BELVOIR, VIRGINIA 22060-5546



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Subject: DoD/FEA's Notice of Filing Summaries

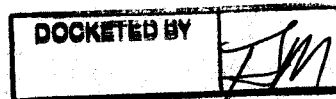
Re: Docket Nos. E-01345A-10-0394; E-01345A-12-0290; E-01933A-12-0296;
E-04204A-12-0297 (Consolidated)

Dear Clerk:

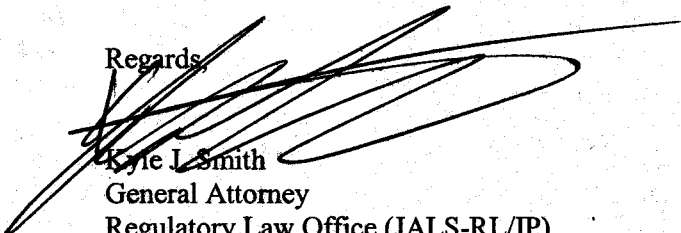
Please find attached hereto the U.S. Department of Defense and all other Federal Executive Agencies' ("DoD/FEA") Notice of Filing the Summaries of Cynthia J. Cordova's Direct and Surrebuttal Testimony and Kathleen K. Ahsing's Direct Testimony in the above captioned consolidated matter.

Thank you in advance for your attention to this important matter. Please call if there are any problems or if any further action is needed. I can be reached at (703) 693 - 1274 or by e-mail at kyle.j.smith124.civ@mail.mil.

Arizona Corporation Commission
DOCKETED
JUN 08 2013



Regards,


Kyle J. Smith
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Enclosure: Notice of Filing Summaries with attached Summaries

Cc: See Service List

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

BOB STUMP - Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH

IN THE MATTER OF ARIZONA PUBLIC SERVICE COMPANY REQUEST FOR APPROVAL OF UPDATED GREEN POWER RATE SCHEDULE GPS-1, GPS-2, AND GPS-3.	DOCKET NO. E-01345A-10-0394
IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY FOR APPROVAL OF ITS 2013 RENEWABLE ENERGY STANDARD IMPLEMENTATION FOR RESET OF RENEWABLE ENERGY ADJUSTOR.	DOCKET NO. E-01345A-12-0290
IN THE MATTER OF THE APPLICATION OF TUCSON ELECTRIC POWER COMPANY FOR APPROVAL OF ITS 2013 RENEWABLE ENERGY STANDARD IMPLEMENTATION PLAN AND DISTRIBUTED ENERGY ADMINISTRATIVE PLAN AND REQUEST FOR RESET OF ITS RENEWABLE ENERGY ADJUSTOR.	DOCKET NO. E-01933A-12-0296
IN THE MATTER OF THE APPLICATION OF UNS ELECTIC, INC. FOR APPROVAL OF ITS 2013 RENEWABLE ENERGY STANDARD IMPLEMENTATION PLAN AND DISTRIBUTED ENERGY ADMINISTRATIVE PLAN AND REQUEST FOR RESET OF ITS RENEWABLE ENERGY ADJUSTOR.	DOCKET NO. E-04204A-12-0297

NOTICE OF FILING SUMMARY OF
U.S. DEPARTMENT OF DEFENSE AND
ALL OTHER FEDERAL EXECUTIVE AGENCIES' WITNESSES

The United States Department of Defense and all other Federal Executive Agencies
("DoD/FEA"), through undersigned counsel, hereby file the Summaries of Cynthia J.
Córdova's Direct and Surrebuttal Testimony and Kathleen K. Ahsing's Direct Testimony.

Respectfully submitted,



Kyle J. Smith

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Regulatory Law Office (JALS-RL/IP)
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U.S. Army Legal Services Agency
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For
The United States Department of Defense
And
All Other Federal Executive Agencies

SERVICE LIST

The original and thirteen (13) copies of the foregoing is being transmitted Federal Express overnight delivery this 31st day of May 2013 to be received and filed on the 3rd day of June 2013 with:

Docket Control Division
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Phoenix, Arizona 85007

A copy of same is being served by e-mail or first class mail on the 31st day of May 2013 to the following:

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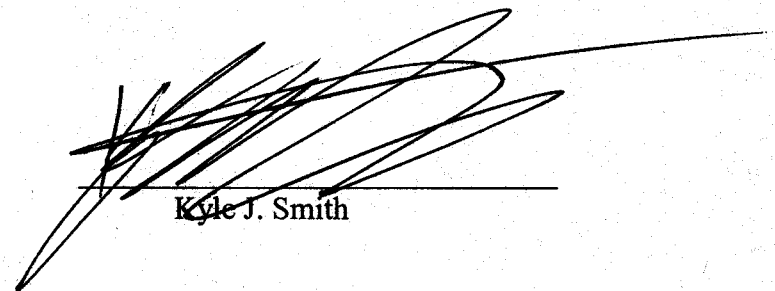
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Kyle J. Smith

1
2 **BEFORE THE ARIZONA CORPORATION COMMISSION**
3 **DOCKET NO. E-01345A-12-0290; DOCKET NO. E-01345A-10-0394;**
4 **DOCKET NO. E-01933A-12-0296; DOCKET NO. E-04204A-12-0297**
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6 **Summary of Direct Testimony of Kathy Ahsing, P.E.**
7 **On Behalf of**
8 **The Department of Defense and All Other Federal Executive Agencies**
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11 Ensuring that our installations have the ability to perform our mission in the face of the threats to energy
12 security is a top priority for the Army. The Army is focused on enhancing the energy security of our
13 installations and meeting our Federal goals by supporting the development of renewable energy. States
14 like Arizona support our military mission as well as provide attractive resources and markets for us to
15 consider renewable energy project development.

16 I am submitting this testimony, on behalf of the DoD, recommending against the initial "Track and
17 Record" proposal. The ability to retain Renewable Energy Credits (RECs) is necessary for the Army's
18 compliance with the Energy Policy Act of 2005 and Executive Order 13423 Federal renewable energy
19 goals, as well as a critical component to making privately financed renewable energy projects on our
20 land economically viable. Our position is that any changes in either the ability of the Army to count
21 RECs towards our renewable energy goals, or that may decrease the potential value of RECs to private
22 developers, would have a negative impact on the viability of Army renewable energy projects in
23 Arizona.

24 The Army will pursue renewable projects across the U.S. that continue to present the best value. We
25 look forward to working with the Arizona Corporation Commission, the Arizona utility companies, and
26 other stakeholders to ensure the market for renewable energy in Arizona remains strong and can play a
27 key role in meeting the Army's installation energy security needs.

BEFORE THE ARIZONA CORPORATION COMMISSION
DOCKET NO. E-01345A-12-0290; DOCKET NO. E-01345A-10-0394;
DOCKET NO. E-01933A-12-0296; DOCKET NO. E-04204A-12-0297

Summary of Direct Testimony of Cynthia J. Córdova
On Behalf of
The Department of Defense and All Other Federal Executive Agencies

In my Direct Testimony on behalf of the Department of Defense and all other Federal executive agencies, I express VA's concern that the "Track and Record" mechanism as originally proposed would result in double counting Veterans Affairs' (VA) Renewable Energy Certificates (RECs), depriving VA of a large portion of the value of its investment in renewable energy, and rendering the RECs useless for the purpose of complying with federal mandates. I state that one alternative VA could support is requiring utilities to continue to purchase RECs to meet Arizona's distributed energy (DE) requirements. I express concern with the alternatives in Mr. Bernosky's and Mr. Tilghman's testimonies requiring the surrender of RECs in exchange for interconnection and net metering, respectively. Finally, I explain that the alternate "Track and Reduce" mechanism is another form of double counting.

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2 **BEFORE THE ARIZONA CORPORATION COMMISSION**
3 **DOCKET NO. E-01345A-12-0290; DOCKET NO. E-01345A-10-0394;**
4 **DOCKET NO. E-01933A-12-0296; DOCKET NO. E-04204A-12-0297**
5

6 **Summary of Corrected Surrebuttal Testimony of Cynthia J. Córdova**
7 **On Behalf of**
8 **The Department of Defense and All Other Federal Executive Agencies**
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11 In my Surrebuttal Testimony on behalf of the Department of Defense and all other Federal Executive
12 Agencies, I explain that the alternative solution proposed by the ACC Staff, and supported by Mr.
13 Tilghman in his testimony – “Track and Monitor” – would still result in double counting of Renewable
14 Energy Certificates (RECs) because the kWhs associated with those RECs would be used to comply
15 with Arizona’s Renewable Energy Standard. I clarify that Veterans Affairs’ (VA) non-acceptance of
16 utility incentives does not necessarily mean, as suggested in Mr. Tilghman’s Rebuttal Testimony, that
17 the distributed energy carve out and utility incentives have not had an impact on overall investment in
18 distributed energy in Arizona. Finally, I reiterate that the primary concern of my testimony is
19 maintaining the integrity of VA’s RECs, and that while VA supports requiring utilities to purchase
20 RECs as a method to protect REC integrity, that support is not intended as a policy suggestion.